



U.S. Department of Justice

Civil Division
Federal Programs Branch
20 Massachusetts Ave, N.W.
Washington, DC 20530

May 28, 2015

VIA ECF

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: Tilton v. SEC, No. 15-cv-2472 (RA)

Dear Judge Abrams:

We write on behalf of Defendant the Securities and Exchange Commission (the “SEC”) to respectfully request an extension of time in which to answer or otherwise respond to the complaint in this case. Pursuant to Federal Rule of Civil Procedure 12(a)(2), the SEC’s answer or other response is currently due on June 1, 2015. Plaintiffs’ motion for preliminary injunction is presently pending before the Court.

The SEC respectfully requests that it be given until 10 days following this Court’s ruling on plaintiffs’ motion for preliminary injunction to answer or otherwise respond to the complaint. The undersigned has conferred with counsel for plaintiffs and he informed me that plaintiffs consent to this request.

We thank you for your consideration of this request.

Dated: May 28, 2015

Respectfully submitted,

PREET BHARARA
United States Attorney

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General

JEANNETTE A. VARGAS
Assistant United States Attorney
U.S. Attorney’s Office
Southern District of New York
86 Chambers Street, 3rd Fl.
New York, NY 10007
Phone: (212) 637-2678
Fax: (212) 637-2702

KATHLEEN R. HARTNETT
Deputy Assistant Attorney General

JENNIFER D. RICKETTS
Director, Federal Programs Branch

SUSAN K. RUDY
Assistant Director, Federal Programs Branch

/ Jean Lin

JEAN LIN
ADAM GROGG
STEVEN A. MYERS
MATTHEW J. BERNS
U.S. Department of Justice, Civil Division,
Federal Programs Branch
20 Massachusetts Ave. NW
Washington, DC 20530
Phone: (202) 514-3716
Fax: (202) 616-8202
Email: jean.lin@usdoj.gov